

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

IN RE:	§	
	§	
JOSHUA DEROCHE	§	CAUSE NO. 23-10454
xxx-xx-2176	§	(CHAPTER 13)
312 Shannon Ln.	§	
Nederland, Texas 77627	§	
	§	
DEBTOR	§	

**DEBTOR’S MOTION TO EXTEND DEADLINE TO FILE
SCHEDULES, STATEMENTS AND CHAPTER 13 PLAN**

TO THE HONORABLE JOSHUA SEARCY, U.S. BANKRUPTCY JUDGE:

COMES NOW, **JOSHUA DEROCHE**, Debtor in the above referenced bankruptcy case, filing this his Motion to Extend Deadline to File Schedules, Statements and Chapter 13 Plan, and as grounds therefore respectfully shows the Court as follows:

1. Debtor filed a Voluntary Petition under Chapter 13 of Title 11 of the United States Code on November 9, 2023.
2. Debtor filed a list of creditors and their addresses along with the Petition.
3. Debtor will need additional time to assemble all of the supporting documentation and information. In order to prepare the schedules and statements required by the Code, it is necessary to gather information from various documentation and records relating to Debtor’s business affairs. The gathering of the information from the documentation and other sources has been commenced. Additional time is required in order for the Debtor to properly review the schedules and other documentation before execution and filing. Therefore, an additional 10 days is requested for completion of this

gathering of information and to prepare the schedules, statements and Chapter 13 Plan. Debtor has been diligent in his efforts, but additional time is required.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that the time for the filing of schedules, statements and Chapter 13 Plan be extended for a minimum of 10 days, and that Debtor have such other and further relief to which he may be justly entitled.

DATED: November 22, 2023

Respectfully submitted,

MAIDA CLARK LAW FIRM, P.C.
4320 Calder Avenue
Beaumont, Texas 77706-4631
(409) 898-8200
(409) 898-8400 - telecopier

By: /s/ Frank J. Maida
Frank J. Maida
State Bar No. 12845600

ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing has been properly forwarded via electronic mail or first class mail to all parties on the attached matrix on this the 22nd day of November 2023.

By: /s/ Frank J. Maida
Frank J. Maida